

**STATE OF NEW HAMPSHIRE
DEPARTMENT OF STATE
BUREAU OF SECURITIES REGULATION**

IN THE MATTER OF:)
)
)
Local Government Center, Inc.; Local)
Government Center Real Estate, Inc.;)
Local Government Center Health Trust,)
LLC; Local Government Center)
Property-Liability Trust, LLC;)
Health Trust, Inc.; New Hampshire)
Municipal Association Property-Liability)
Trust, Inc.; LGC-HT, LLC; Local)
Government Center Workers')
Compensation Trust, LLC; and the)
following individuals: Maura Carroll,)
Keith R. Burke, Stephen A. Moltenbrey,)
Paul G. Beecher, Robert A. Berry,)
Roderick MacDonald, Peter J. Curro,)
April D. Whittaker, Timothy J. Ruehr,)
Julia N. Griffin, Paula Adriance, John)
P. Bohenko, and John Andrews)
_____)

AMENDED MOTION TO INTERVENE

NOW COMES, Attorney Glenn R. Milner, on behalf of Molan, Milner & Krupski, PLLC ,and moves to amend the Motion to Intervene and says as follows:

1. On or about September 6, 2011, a Motion to Intervene was filed on behalf of a class of retiree members of the Professional Fire Fighters of New Hampshire and the Professional Fire Fighters of New Hampshire (representing nearly all active full time, firefighter public employees), and each requested to be considered an "interested party" in this matter.
2. On or about September 15, 2011, the Department issued an Order permitting the petitioning intervenor to attend the preliminary legal conference on October 4, 2011.
3. Counsel moves to amend the Motion to Intervene as follows to include additional organizations who seek counsel to represent them as "interested parties" as that term is utilized in

RSA 421-B:26-a, as they have a direct pecuniary interest in the outcome of this matter. The organizations are as follows:

- The State Employees' Association of New Hampshire, SEIU Local 1984 ("SEA") represents hundreds of active and retired municipal workers through whom receive benefits through the Local Government Center ("LGC").
- The SEA also represents thousands of active and retired State employees whom receive pharmacy benefits through the LGC.
- The National Education Association New Hampshire ("NEA-NH") represents hundred of teachers, secretaries and educational support personnel whom receive benefits through the LGC.
- The American Federation of State, County and Municipal Employees, Council 93 ("AFSCME") represents hundreds of State, County and Municipal employees whom received benefits through the LGC.
- The American Federation of Teachers New Hampshire ("AFT") represents hundreds of teachers, paraprofessionals and other school-related personnel whom received benefits through the LGC.

4. Incorporated herein by reference this Amended Motion to Intervene includes all the allegations contained in the initial Motion to Intervene filed in this matter.

Respectfully submitted,
MOLAN, MILNER & KRUPSKI, PLLC

September 21, 2011

/s/ Glenn R. Milner, Esq.
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(603) 410-6011

CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing was this same day forwarded via electronic mail to Earl Wingate, Esq., William Saturley, Esq., David Frydman, Esq., Brian M. Quirk, Esq., Peter Perroni, Esq., and Michael D. Ramsdell, Esq.

/s/ Glenn R. Milner, Esq. _____
Glenn R. Milner, Esq.